

Maureen Benitz  
Senior Campaign Finance and Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Dear Maureen:

I am writing first with respect to your letter dated March 17, 2011 and the fact that we contributed \$1000 too much to Patrick Murphy for Congress for the 2010 general election. I wanted to let you know that we succeeded at reaching representatives from that campaign committee and received in the mail two days ago a \$1000 contribution refund. I will include that contribution refund on our next Victory NOW PAC report, which is due on July 31, 2011. In the meantime, I wanted to be sure you knew that we were able to resolve this issue.

I am also writing in response to your April 13, 2011 letter concerning the totals listed on Lines 11(a)(i), 11(a)(ii), 21(b), 21(c) and 23 Column B of the Detailed Summary Page of the Amended 30 Day Post-General Report (10/14/2010 - 11/22/2010) filed on 3/21/2011.

With respect to the expenditure totals on lines 21(b), 21(c) and 23 Column B, I reviewed our FEC reports back to January 2010 and discovered an error in the report filed for the period from 4/1/2010 to 4/30/2010.

On 4/29/10 I reversed three old contributions made by checks that were never cashed: \$2000 made payable to Scott Murphy for Congress, \$2000 made payable to Perriello for Congress, and another \$2500 made payable to Perriello for Congress. On the original report for April, I mistakenly coded these as reversals of operating expenditures (line 21) instead of reversals of contributions to federal candidate committees (line 23).

Today, I filed an amendment to the report for April and changed the codes for those three reversals so that they are now reported correctly on line 23 instead of line 21.

This resulted in corresponding changes to the Column B totals for these two lines and when I carry forward those changes through to the Amended 30 Day Post-General Report (10/14/2010 - 11/22/2010) filed on 3/21/2011, I find that the Column B totals for these two lines are now correct.

I have also filed today an amendment to the FEC reports for May and June and plan to file the amendments to the remainder of the reports up through the 2010 Year-End Report (11/23/2010 to 12/31/2010).

The original expenditure errors and subsequent corrections did not affect cash on hand or the total amount of disbursements that Victory NOW PAC had for any of the reporting periods.

With respect to the contribution totals on lines 11(a)(i) and 11(a)(ii), I also reviewed our FEC reports back to January 2010. It looks like starting in the FEC report for July 2010, the way the software I use calculates itemized versus unitemized contributions shifted somehow. I have spent quite a bit of time trying to understand what shifted or if I somehow started entering the relevant data in a different way, but I have not succeeded at discovering why this discrepancy exists.

However, the amounts of total contributions listed on line 11(a)(iii), Columns A and B for each reporting period from the July 2010 report through the 2010 Year-End Report have not been affected. Nor has the cash on hand for each reporting period been affected.

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**ETEXT ATTACHMENT**

Please let me know if you would like for me to continue to explore why these numbers are slightly off. In the meantime, I will hold off on filing the July through Year-End 2010 amendments to the expenditure totals so that if an amendment does need to be filed for the unitemized/itemized contribution totals, the two types of corrections will be reflected in a single amendment.

Please feel free to contact me at [jenny.kensington@verizon.net](mailto:jenny.kensington@verizon.net) or 301-946-3804 if you have any questions or would like to discuss this further.

Thanks very much.

Jennifer Lewis Smith  
Treasurer  
Victory NOW PAC